



## ENCINA WASTEWATER AUTHORITY

A Public Agency

October 24, 2003

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Ref: Admin.03-7349

State Water Resources Control Board  
9174 Sky Park Court, Suite 100  
San Diego, California 92123-4340

**ATTENTION:** Mr. John Robertus, POTW Compliance Unit

**SUBJECT:** TENTATIVE ADDENDA TO MONITORING AND REPORTING  
PROGRAMS OF NPDES PERMITS FOR AGENCIES DISCHARGING  
TO THE OCEANSIDE AND ENCINA OCEAN OUTFALLS

**REFERENCE:** POTW: 01-0030.02:VASQV

Dear Mr. Robertus:

As requested in the California Regional Water Quality Control Board (Regional Board) letter dated October 9, 2003, this letter addresses written comments on the TENTATIVE ADDENDUM NO. 3 TO ORDER NO. 2000-36 NPDES NO CA0107395, An Addendum to Revise the Monitoring and Reporting Program for the Encina Wastewater Authority Discharge to the Pacific Ocean Through the Encina Ocean Outfall.

The Encina Wastewater Authority (EWA) appreciates the opportunity to provide the following comments on the "Standard Operating Procedures for the Collection of Water Samples for Bacterial Analysis from Ocean and Bay Receiving Waters":

- Many versions of the Standard Methods for Waster Analysis exist in varying forms; therefore, we suggest using the words, "most current approved version" (Reference: Shoreline Sample Collection, Introduction).
- Wearing gloves during sample gathering is not practical as they become slippery (Reference: Shoreline Sample Collection, General Standard Sampling Procedures).
- The use of 100 ml bottles is not sufficient for the membrane filtration and testing required by the NPDES permit; instead EWA uses 500 ml bottles (Reference: Shoreline Sample Collection, General Standard Sampling Procedures).
- Please provide more clarification on the methods necessary to ensure sterilized samples bottles are EPA approved (Reference: Shoreline Sample Collection, Sampling Report and Documentation).

Mr. John Robertus

Subject: Tentative Addenda to Monitoring and Reporting Programs of NPDES Permits for  
Agencies Discharging to the Oceanside and Encina Ocean Outfalls

October 24, 2003

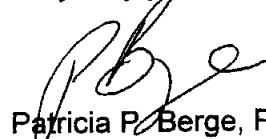
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- The use of a pole for sampling is not practical, and may pose a safety concern, in some conditions where sampler is required to cross cliffs to get to the shoreline (Reference: Shoreline Sample Collection, Section iv).
- A depth of 12 inches for sampling, in our experience, results in additional sediment in the sample; a depth of greater than 12 inches may be more appropriate (Reference: Shoreline Sample Collection, Section viii).
- During certain conditions, sediment will enter the sample bottle regardless of the sampling procedure (Reference: Shoreline Sample Collection, Section xiii).

Should you have any questions, please do not hesitate to contact Jeff Parks, Laboratory Supervisor, at (760) 438-3941 or [jeff@encinajpa.com](mailto:jeff@encinajpa.com).

Very truly yours,



Patricia P. Berge, P.E.  
Director of Environmental Compliance

cc: Mike Hogan, EWA  
Jeff Parks, EWA



Serving North  
San Diego County

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